1 2 3 4 5 6 7 8	KNIGHT LAW GROUP LLP Kamau Edwards (SBN 230826) kamaue@knightlaw.com Daniel Kalinowski (SBN 305087) danielk@knightlaw.com Phil A Thomas (SBN 248517) philt@knightlaw.com 10250 Constellation Blvd., Suite 2500 Los Angeles, CA 90067 Telephone: (310) 552-2250 Fax: (310) 552-7973 Attorneys for Plaintiffs,	
10	TONY CLARK and PAMELA ELY	
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12	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
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14	TONY CLARK and PAMELA ELY,	Case No.: 2:22-cv-03069-SVW-
15	TOTAL CLARK and LAWIELA ELI,	GJS
16 17	Plaintiffs, v.	(Removed from Superior Court of California, County of Los Angeles, Case No. 22STCV11319)
18 19	FORD MOTOR COMPANY, a	DECLARATION OF PHIL A THOMAS IN SUPPORT OF PLAINTIFFS' REPLY IN
20	Delaware corporation; DOES 1 through 10, inclusive	SUPPORT OF MOTION FOR REMAND TO SUPERIOR COURT OF CALIFORNIA
21	Defendants.	Assigned for All Purposes to the Honorable Stephen V. Wilson
22		Honorable Stephen V. Wilson
23 24		Date: July 11, 2022 Time: 1:30 p.m. Courtroom: 10A
25		Action Filed: April 1, 2022
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I, Phil A Thomas, declare as follows:

- I am an attorney admitted to practice before the United States District Court for the Central District of California. I am an attorney at Knight Law Group, LLP, and counsel of record for Plaintiffs Tony Clark and Pamela Ely ("Plaintiffs") in the above-captioned matter.
- I have personal knowledge of the facts set forth herein and could testify 2. competently if called upon to do so.
- In the matter of Chavez v. Ford Motor Company, No. 2:20-cv-08508-3. MCS-PVC (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$2,500. My office defended the plaintiff's deposition and conducted six depositions of Ford dealership personnel, and propounded and responded to written discovery interrogatories and requests. There was also an in-person inspection of the plaintiff's vehicle attended by the parties' attorneys and experts. Attached as **Exhibit** A is a true and correct copy of executed Rule 68 offer wherein my office agreed to accept fees, costs and expenses in the amount of just \$2,500.
- In the matter of Arriaga v. FCA US, LLC, No. PSC2004169, Riverside County (2021), attorneys' fees, costs and expenses settled in the amount of \$7,500. Attached as **Exhibit B** is a true and correct copy of the stipulation for attorneys' fees, costs and expenses filed in this action.
- In the matter of Velasquez v. FCA US, LLC, No. 2:21-cv-05092-JFW-5. AGR (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$8,250. Attached as Exhibit C is a true and correct copy of the stipulation for attorneys' fees, costs and expenses filed with the Court in this action.
- In the matter of Luna v. FCA US. LLC, No. 2:21-cv-07140-AB (JPRx) 6. (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$4,500. Attached as **Exhibit D** is a true and correct copy of the stipulation for attorneys' fees, costs and expenses filed with the Court in this action.

- 7. In the matter of *Garay v. Ford Motor Company*, No. 5:21-cv-01200-SB-SHK (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$2,500. My office defended the plaintiff's deposition, conducted four depositions of Ford dealership personnel, and propounded and responded to written discovery interrogatories and requests. Attached as **Exhibit E** is a true and correct copy of executed Rule 68 offer wherein my office agreed to accept fees, costs and expenses in the amount of just \$2,500.
- 8. In the matter of *Valdez v. FCA US, LLC*, No. 2:21-cv-06318-FLA-JEM (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$5,500. The parties did not execute and submit a stipulation in this case, but should the Court wish to view email correspondence between the parties confirming this agreement, I would be more than happy to submit it to the Court.
- 9. In the matter of *Aguilar v. FCA US, LLC*, No. 2:21-cv-05813-AB (ASx) (C.D. Cal. 2021), attorneys' fees, costs and expenses settled in the amount of \$6,500. Attached as **Exhibit F** is a true and correct copy of the stipulation for attorneys' fees, costs and expenses filed with the Court in this action.
- 10. In the matter of *Valle v. FCA*, No. 5:21-cv-01131-JWH-SHKx (C.D. Cal. 2022), attorneys' fees, costs and expenses settled in the amount of \$9,500. Attached as **Exhibit G** is a true and correct copy of the stipulation for attorneys' fees, costs and expenses filed with the Court in this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on June 27, 2022 in Oakland, California.

/s/ Phil A Thomas Phil A Thomas